



Control Number: 51812



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**PROJECT NO. 51812**

<b>ISSUES RELATED TO THE STATE</b>	<b>§</b>	<b>PUBLIC UTILITY COMMISSION</b>
<b>OF DISASTER FOR THE</b>	<b>§</b>	
<b>FEBRUARY 2021 WINTER</b>	<b>§</b>	<b>OF TEXAS</b>
<b>WEATHER EVENT</b>	<b>§</b>	

**COMMENTS REGARDING**  
**FEBRUARY 15, 2021 COMMISSION ORDER**

Farmers Electric Cooperative, Inc. (“Farmers”) files these Comments Regarding the Public Utility Commission of Texas’s (“Commission”) February 15, 2021 Order – Order Directing ERCOT to Take Action and Granting Exception to Commission Rules (the “February 15 Order”).

**I. RELIEF REQUESTED**

Farmers Electric Cooperative, Inc. is an electric cooperative that serves approximately 56,000 customers in Texas. Farmers respectfully requests that the Commission enforce, or, in the alternative, clarify, its February 15 Order<sup>1</sup> to ensure that immediately after customer firm load shed ended at 23:55 on February 17, 2021, administrative price adders were removed from the real time energy market clearing prices. The economic effect of not enforcing, or in the alternative not clarifying, the February 15 Order will be hardship and financial detriment to our customers for years to come. Farmers supports the comments filed by Pedernales Electric Cooperative, Bandera Electric Cooperative, Bluebonnet Electric Cooperative and the City of San Marcos (“Joint Commenters”) filed in this docket on March 9, 2021.

Farmers requests that the Commission enforces its February 15 Order – as written – and direct the Electric Reliability Council of Texas (ERCOT) to remove the system-wide offer cap price adder from the real-time energy prices for the 32 hours firm load was not being shed. This action is entirely within the Commission’s authority and would correct the financial penalty that Load Serving Entities incurred for acting quickly in a humanitarian way to stop the suffering of Texans and restore power as quickly as possible. Such an order would also clearly resolve this

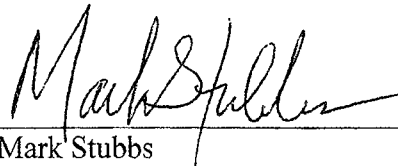
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<sup>1</sup> Project No. 51617, *Oversight of the Electric Reliability Council of Texas*, Order Directing ERCOT to Take Action and Granting Exception to Commission Rules (Feb. 15, 2021) (refiled in Project No. 51812). The February 15, 2021 Order was replaced by an Order on February 16, 2021, but the February 16 Order did not change the section of the February 15 Order addressed here.

issue, providing regulatory certainty for the market participants, a result which all market participants desire. The Commission has clear authority to enforce, or clarify if necessary, its February 15 Order as explained in the comments filed by the Joint Commenters and Farmers fully supports and agrees with those Comments.

Farmers Electric Cooperative, Inc. appreciates the opportunity to provide these comments to the Commission.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Mark Stubbs", is written over a horizontal line.

Mark Stubbs  
Chief Executive Officer  
Farmers Electric Cooperative, Inc.